



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 8, 2019

Ms. Crystal Layton
Regulatory Manager
United Phosphorus, Inc.
630 Freedom Business Center
Suite 402
King of Prussia, PA 19406

Subject: Label Amendment – Revising Tank Mix Use Directions for Cotton and Corn
Product Name: **STartUP Azoxy Seed Treatment**
EPA Registration Number: 70506-343
Application Date: December 18, 2018
Decision Number: 547709

Dear Ms. Layton:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

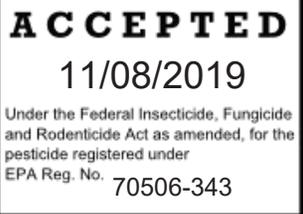
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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Eleanor Thornton by phone at 703-305-6799, or via email at Thornton.eleanor@epa.gov.

A handwritten signature in black ink, reading "Shaja B. Joyner". The signature is written in a cursive style with a large initial 'S'.

Shaja B. Joyner, Product Manager 20
Fungicide-Herbicide Branch
Registration Division 7505P

Enclosure



Azoxystrobin	Group	11	Fungicide
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STartUP™ AZOXY SEED TREATMENT

A broad spectrum fungicide for seed treatment.

ACTIVE INGREDIENT:	% By Weight
Azoxystrobin: methyl (E)-2-[2-[6-(2-cyanophenoxy)pyrimidin-4-yloxy]phenyl]-3-methoxyacrylate*	22.9%
OTHER INGREDIENTS:	<u>77.1%</u>
TOTAL:	100.0%

*Containing 2.08 lbs. of azoxystrobin per gallon.

KEEP OUT OF REACH OF CHILDREN CAUTION

[Optional Booklet Use Statements:
PEEL DOWN FOR DIRECTIONS

See inside for First Aid, Precautionary Statements, and complete Directions For Use.
See attached booklet for complete Precautionary Statements, and complete Directions For Use.]

FIRST AID	
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
HOTLINE NUMBER	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. FOR EMERGENCY MEDICAL ASSISTANCE, CALL THE ROCKY MOUNTAIN POISON CONTROL AND DRUG CENTER 1-866-673-6671.</p>	

**FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident, call
CHEMTREC 1-800-424-9300**

NET CONTENTS: _____ Gallons

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
1-800-438-6071

EPA Reg. No. 70506-343
EPA Est. No. _____

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Harmful if absorbed through skin, inhaled or swallowed. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated water before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material such as polyvinyl chloride, nitrile rubber or butyl rubber
- Shoes plus socks

USER SAFETY REQUIREMENTS

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d)(4-6), the handler PPE requirements may be reduced or modified as specified in the WPS.

IMPORTANT: When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

USER SAFETY RECOMMENDATIONS

Users should:

- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Azoxystrobin is toxic to freshwater and estuarine/marine fish and aquatic invertebrates. Azoxystrobin can be persistent for several months or more after application. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment washwater or rinsate.

GROUNDWATER ADVISORY

Azoxystrobin and a degradate of azoxystrobin are known to leach through soil to ground water under certain conditions as a result of label use. Use of this chemical may leach into ground water if used in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

SURFACE WATER ADVISORY

This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having a high potential for reaching surface water via runoff for several months or more after application. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of azoxystrobin and a degradate of azoxystrobin from runoff water and sediment. Runoff of this product will be reduced by avoiding applications when rainfall or irrigation is expected to occur within 48 hours. If any adverse environmental effects caused by this product are detected, notify your UPI representative and state/Federal authorities immediately.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read the label in its entirety before using this product.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Adverse crop response, decreased disease control or illegal crop residues may result if the Directions for Use, Restrictions and Precautions are not followed.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 4 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material such as polyvinyl chloride, nitrile rubber or butyl rubber
- Shoes plus socks

PRODUCT INFORMATION

STartUP AZOXY SEED TREATMENT provides a broad-spectrum systemic preventative treatment against many plant diseases. STartUP Azoxy can be applied in tank mixes with other registered seed treatment products. It is important to observe all directions for use, crops use sites, use rates dilution ratios, restrictions and labeled precautions which may appear on the tank-mix partner label. It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

RESISTANCE MANAGEMENT

For resistance management, STartUP AZOXY contains a Group 11 fungicide. Any fungal population may contain individuals naturally resistant to STartUP AZOXY and other Group 11 fungicides. A gradual or total loss of pest control may occur over time if these fungicides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

TO DELAY FUNGICIDE RESISTANCE, TAKE ON OR MORE OF THE FOLLOWING STEPS:

- Rotate the use of STartUP AZOXY or other Group 11 fungicides within a growing season sequence with different groups that can control the same pathogens.
- Use tank mixtures with fungicides from a different group that are equally effective on the target pest when such use is permitted. Use at least the minimum application rate as labeled by the manufacturer.
- Adopt and integrated disease management program for fungicide use that includes scouting, uses historical information related to pesticide use, and crop rotation, and which considers host plant resistance, impact of environmental conditions on disease development, disease thresholds, as well as cultural, biological and other chemical control practices.
- Where possible, make use of predictive disease models to effectively time fungicide applications. Note that using predictive models alone is not sufficient to manage resistance.
- Monitor treated fungal populations for resistance development.
- Contact your local extension specialist or certified crop advisor for any additional pesticide resistance-management and/or IPM recommendations for specific crops and pathogens.

When applications are made to the seed or soil using a Group 11 fungicide, another application of a Group 11 fungicide product must not be made for at least 3 weeks. **Do not rotate or tank mix this product with any product where resistance has been observed.**

SEED TREATMENT

***Not for use in California**

RESTRICTIONS:

- DO NOT feed clippings or graze animals to turf that have been treated with this product.
- Do NOT plant millet or buckwheat for 1 year after the last azoxystrobin application.

Seed Bag Label Requirements

The Federal Seed Act requires that containers containing treated seed be labeled with the following statements:

- This seed has been treated with azoxystrobin.
- Do not use treated seed for feed, food, or oil purposes.

The U.S. Environmental Protection Agency requires the following statements on containers containing seed treated with azoxystrobin:

- Store treated seed away from food and feedstuffs.
- Do not allow children, pets, or livestock to have access to treated seeds.
- Wear long pants, long-sleeved shirt and protective gloves when handling treated seed.
- Treated seeds exposed on soil surface may be hazardous to wildlife. Cover or collect treated seeds spilled during loading and planting.
- Dispose of all excess treated seed by burying seed away from bodies of water.
- Do not contaminate bodies of water when disposing of planting equipment wash water.
- Dispose of seed packaging or containers in accordance with local requirements.
- Excess treated seed may be used for ethanol production only if (1) by-products are not used for livestock feed and (2) no measurable residues of pesticide remain in ethanol by-products that are used in agronomic practice.

Coloring Treated Seed

By law, any seed treated with this product must be colored to prevent use for feed for animals or food for humans. Any formulation of this product that does not already contain dye must use an EPA-approved dye to color treat seed. Refer to 40CFR§153.155 for more information.

Directions for Seed Treatment

Apply this product as a slurry or mist seed treatment at the rate listed in the **Specific Seed/Disease Instructions - Seed Treatment** section below per 100 pounds of seed. For maximum results, seed should be in good condition and properly cured prior to treatment and applications of this product must be uniformly applied to all seed being treated. Consult a seed treatment specialist to determine appropriate slurry rates for the seed being treated.

This product provides broad-spectrum protection against *Rhizoctonia* spp. and *Pythium* spp. seed and seedling diseases. Combine this product with a Pythium-active seed treatment product.

Disease Instructions - Seed Treatment

Crops	Disease	Application Instructions
Canola	Blackleg (<i>Phoma lingam</i>) Seedling Rhizoctonia Damping-Off (<i>Rhizoctonia solani</i>) Seedling Blight (<i>Alternaria</i> spp.)	Apply 1.5 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry.
Corn - Field, Pop & Sweet (including seed production)	Seed-borne and Soil-borne Fungi causing Decay, Damping-Off, and Seedling Blight, Seedling Damping-Off (<i>Rhizoctonia</i> spp., <i>Penicillium</i> spp., <i>Pythium</i> spp.)	Apply 0.04 – 0.19 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed (0.018 – 0.085 fluid ounce per 80,000 kernel count assuming 80,000 kernels = 45 pounds) as a mist seed treatment or slurry. For optimum results for control of <i>Pythium</i> spp., tank mix this product with STartUP METXL Seed Treatment. Observe the most restrictive limitations, rates, and precautions from each tank mix product.

Crops	Disease	Application Instructions
Cotton	Seedling Rhizoctonia Damping-Off (<i>Rhizoctonia solani</i>) Pythium Seedling Blight (<i>Pythium aphanidermatum</i>)	Apply 0.04 – 1.5 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry. For optimum results for control of <i>Pythium</i> spp., tank mix this product with STartUP METXL Seed Treatment. Observe the most restrictive limitations, rates, and precautions from each tank mix product.
Curcubit	Seedling Rhizoctonia Damping-Off (<i>Rhizoctonia solani</i>) General Seed Decay Fungi	Apply 0.25 – 1.5 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry.
Peanut	<u>Suppression ONLY</u> Seedborne Diseases, Rhizoctonia Damping-Off (<i>Rhizoctonia solani</i>)	Apply 0.25 – 0.30 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry.
Potato	Protection from Silver Scurf (<i>Helminthosporium solani</i>) <u>Suppression ONLY</u> Black Scurf & Stem Canker (<i>Rhizoctonia solani</i>)	Apply 0.31 – 1.5 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry.
Rice	Seed-borne Fungi and Early Season Diseases, Sheath Blight (<i>Rhizoctonia solani</i>)	Apply 0.25 – 1.5 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry.
Soybean	Seed-borne and Soil-borne Fungi causing Decay, Damping-Off, and Seedling Blight, Seedling Damping-Off (<i>Rhizoctonia</i> spp., <i>Pythium</i> spp.) <u>Suppression ONLY</u> White Mold (<i>Sclerotium rolfsii</i>)	Apply 0.06 – 0.30 fluid ounce of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry.
Sunflower	Downy Mildew (<i>Plasmopara halstedii</i>)	Apply 0.25 – 1.8 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry. For optimum results, be sure that the seeds are uniformly covered by the treatment.
Tomato	Seed Decay and Early Season Diseases, Rhizoctonia Damping-Off (<i>Rhizoctonia solani</i>)	Apply 0.25 – 1.5 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry.
Wheat	Protection from Seedborne Diseases & Common Bunt (<i>Tilletia caries</i>) <u>Partial Control</u> Dwarf Bunt (<i>Tilletia controversa</i>)	Apply 0.25 – 1.5 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry.
Flowering Trees, Ornamentals & Turfgrass	Seedborne Diseases, Rhizoctonia Damping-Off (<i>Rhizoctonia solani</i>)	Apply 0.25 – 1.5 fluid ounces of STartUP AZOXY per hundredweight (cwt) of seed as a mist seed treatment or slurry.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Always store pesticides in the original container. Store pesticides away from food, pet food, feed, seed fertilizers, and veterinary supplies. Mop up any spills on paved surfaces or floors and store in a chemical waste quarantine area until it can be used as instructed in this label or disposed of safely.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

Container Handling:

[Nonrefillable Container (five gallons or less):] Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

[Nonrefillable Container (greater than five gallons):] Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

**IMPORTANT INFORMATION
READ BEFORE USING PRODUCT**

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product reflect the opinion of experts based on field use and tests, and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of UPL NA Inc. or Seller. Handling, storage, and use of the product by Buyer or User are beyond the control of UPL NA Inc. and Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold UPL NA Inc. and Seller harmless for any claims relating to such factors.

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